

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
PLAINTIFF,)	
)	
v.)	
)	Civil No. 10-C0-2946
COOK COUNTY, ILLINOIS;)	
THOMAS DART, COOK COUNTY)	Judge Virginia M. Kendall
SHERIFF (in his official capacity);)	
TODD H. STROGER, COOK COUNTY)	
BOARD PRESIDENT (in his official)	
capacity);)	
COOK COUNTY BOARD OF)	
COMMISSIONERS (in their official)	
capacity);)	
)	
DEFENDANTS.)	
_____)	

CONSENT MOTION FOR CONTINUANCE

The United States, with the consent of Defendants, respectfully requests a continuance of the status hearing currently scheduled for April 13, 2012 in the above-captioned matter to any date between May 10 and May 31, 2012 with the exception of May 17 and 18, 2012.

1. On May 27, 2010, this Court entered an Agreed Order, which settled the United States' complaint regarding conditions of confinement at the Cook County Jail.

2. Pursuant to the Agreed Order, the Court appointed four monitors who are required to submit reports to the Court on a semiannual basis regarding the status of Defendants' compliance with the Agreed Order. The Court has scheduled semiannual status hearings to discuss the Monitors' reports and any other outstanding issues relevant to the above-captioned

matter. The last such status hearing was held on November 4, 2011, at which time the Court scheduled the next status hearing for April 13, 2012.

3. The United States respectfully requests that the status hearing scheduled for April 13, 2012 be continued to a later date due to a scheduling conflict that has arisen for counsel for the United States. As further explanation for the nature of the scheduling conflict, two trial attorneys represent the United States in this matter. One of the attorneys, Kerry Krentler Dean, is currently out of the office for an extended period of time on maternity leave. The other attorney, Michelle Jones, will be out of the country on April 13, 2012 for personal travel.

4. The United States has consulted with opposing counsel and all consent to this request for a continuance of the status hearing.

5. After consulting with opposing counsel regarding their respective schedules, the United States respectfully proposes that the status hearing currently scheduled for April 13, 2012 be rescheduled for any date between May 10 and May 31, 2012 with the exception of May 17 and 18.

6. The United States affirms that there are no matters concerning Defendants' compliance with the Agreed Order that require the Court's immediate attention at this time.

WHEREFORE, for the foregoing reasons, plaintiff, the United States of America, respectfully requests that the Court continue the status hearing to a later date and preferably to any date between May 10 and May 31, 2012 with the exception of May 17 and 18, 2012.

Respectfully submitted,

s/ Michelle A. Jones
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FOR THE UNITED STATES